

# Trans-Lake Washington Project EIS

## Methodology Report – 6/10/02

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### Cultural Resources

Resources investigated in this environmental element include districts, sites, buildings, structures, objects, and landscapes significant in American history, prehistory, architecture, archaeology, engineering, and culture. These resources are protected by a number of statutes and regulations at all levels of government.

### Guiding Plans and Policies

The term “cultural resource(s),” where used below, is a catch-all term that includes the whole range of historic, cultural, and archaeological resources subject to analysis and evaluation in the Trans-Lake Washington Project EIS.

The following laws, statutes, local ordinances, guidelines, and agreements address historic, cultural, and archaeological resources:

- Section 106 of the National Historic Preservation Act (NHPA; 16 USC 470)
- NHPA Regulations for the Protection of Historic Properties (36 CFR 800)
- National Register of Historic Places (NRHP; 36 CFR 60)
- Secretary of the Interior’s Standards and Guidelines for Archaeology and Historic Preservation (FR 44716)
- Section 4(f) of the U.S. Department of Transportation (DOT) Act of 1966, the 1968 Federal-Aid Highway Act, and the 1983 recodification of the DOT Act of 1966 (49 USC 303)
- Federal Highway Administration (FHWA) Guidance for Preparing and Processing Environmental and Section 4(f) Documents, Technical Advisory T 6640.8A, October 30, 1987
- Native American Graves Protection and Repatriation Act (NAGPRA; 25 USC 3001 et seq.)
- Washington State Chapter 27.53 of the Revised Code of Washington (RCW 27.53.060)
- WSDOT Environmental Procedures Manual, Section 456, July 2001.
- The City of Seattle Landmarks Preservation Ordinance (SMC 25.12)
- The City of Seattle’s Department of Construction and Land Use Director’s Rule 2-98

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- Interdepartmental Agreement between the Department of Design, Construction and Land Use and the Department of Neighborhoods, City of Seattle, on Review of Historic Buildings during State Environmental Policy Act Review
  - Comprehensive Plans for Seattle, Medina, Hunts Point, Yarrow Point, Clyde Hill, Kirkland, Bellevue, and Redmond

## Data Needs and Sources

Local agencies and affected Indian Tribes will be contacted to obtain materials that may provide information on existing archaeological resources and traditional cultural places. This information will be used to characterize and assess the potential impacts from the proposed alternatives. Relevant city and state agencies will be contacted for information on identified historic resources in the study area, including the following:

- The Washington Office of Archaeology and Historic Preservation (OAHP).
- Properties listed on the NRHP and the Washington State Heritage Register (WSHR) on file at the OAHP.
- Information regarding properties previously reviewed for NRHP eligibility (Determinations of Eligibility on file at OAHP).
- Data from previous environmental reports and surveys regarding potential historic resources in the project area (on file at OAHP and at other sources noted below).
- Archaeological Site Inventory files (on file at OAHP).
- Tribal input on Traditional Cultural Properties (TCPs). Tribes to be contacted are the Suquamish, Duwamish, Muckleshoot, Tulalip, Yakama, and Snoqualmie.
- TCP files (some on file at OAHP, but most are kept in confidential tribal archives).
- Inventory forms on file with the King County Historic Preservation Program (King County Office of Cultural Resources).
- Lists of heritage resources on file with local jurisdictions (cities, King County, and historical societies).
- The City of Seattle List of Historic Landmarks (on file at the City of Seattle Historic Preservation Program, Department of Neighborhoods).
- University of Washington: Suzzallo Library and Special Collections and Manuscripts.
- Museum of History and Industry (historic photograph collection).
- Seattle Public Library – Seattle Room (and Medina, Hunts Point, Yarrow Point, Clyde Hill, Kirkland, Bellevue, and Redmond as applicable/available).
- Seattle Municipal Archives (and Medina, Hunts Point, Yarrow Point, Clyde Hill, Kirkland, Bellevue, and Redmond as applicable/available).
- Seattle Engineering Department (and Medina, Hunts Point, Yarrow Point, Clyde Hill, Kirkland, Bellevue, and Redmond as applicable/available).

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- Recent (November 2000 or later) aerial photographs overlaid with major project components. The project team will provide aerial photographs. Plots from the GIS system are acceptable.
  - Current GIS mapping of tax lots overlaid with major project components and with tax lot information from the County Assessor's Office. Needed maps will illustrate tax lots with standing buildings/structures whose construction dates are 1960 or earlier. The output maps should be organized by time blocks: pre-1900, 1900-1910, 1910-1920, etc., through 1950-1960.
  - This analysis will be based, in part, on a review of the project impacts and background information reported in other environmental analyses prepared for the Trans-Lake Washington Project. Key elements for review include Recreation, Section 4(f)/ 6(f) Evaluation, Geology and Soils, Water Resources, Ecosystems, Noise and Vibration, and Visual Quality.
  - Other possible sources of information include the USACE-Seattle District cultural resources staff, the Historical Society of Seattle and King County, the Association of Washington Archaeologists, and Advocates for Archaeology and Historic Preservation.

### **Proposed Coordination with Agencies and Tribes**

- Archaeological site and archaeological probability area modeling consultation: Dr. Robert Whitlam, State Archaeologist – OAHP (RobW@cted.wa.gov).
- Information-sharing agreements for GIS: Stephenie Kramer, Assistant State Archaeologist – OAHP (StephenieK@cted.wa.gov) and Joanne L. Markert (jmarkert@geoengineers.com) for GIS data management and GIS technical data transfer.
- Historic resource consultation: Michael Houser, Architectural Historian – OAHP (MichaelH@cted.wa.gov) and Greg Griffith, Deputy State Historic Preservation Officer – OAHP (GregG@cted.wa.gov).

### **Agency and Tribal Coordination**

Consultations with the Washington OAHP will be ongoing throughout the investigation. It is anticipated that most consultations regarding archaeological sites will take place with Dr. Robert Whitlam, state archaeologist. Consultations regarding historic resources will take place with Michael Houser, architectural historian, and Greg Griffith, Deputy SHPO. The cultural resources team will participate, as requested, in consultations with affected Tribes and will define the Area of Potential Effect (APE) of the proposed alternatives. Agreement on APE is crucial for the delineation of areas to be surveyed for the presence of historic resources, archaeological sites, and TCPs.

Investigations within the City of Seattle will be coordinated with Karen Gordon, the Seattle City Historic Preservation Officer, and her staff in the Urban Conservation Division. Planners for the other cities and communities in the study area will be consulted as appropriate, and files and records on these locales will also be directly accessed through them or through the King County Historic Preservation Program. Key stakeholders will be consulted as identified (e.g., Anne Knight/Friends of Olmsted regarding concerns about project effects on historic resources).

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WSDOT and Sound Transit will be assisting FHWA and FTA with their obligations to engage in government-to-government consultations with the Tribes and/or tribal organizations. The cultural resources team will participate in such consultations, if requested. WSDOT will introduce the cultural resources team's participation to the Tribes and/or tribal organizations to facilitate direct staff-to-staff consultations between the cultural resources team and appropriate tribal cultural resources staff.

The Suquamish, Duwamish, Muckleshoot, Snoqualmie, Yakama, and Tulalip Tribes and/or tribal organizations will be contacted by letter and telephone to request appointments to meet with appropriate tribal cultural resources staff. Staff-to-staff consultations will share project information with the tribal cultural resources staff and seek tribal input on setting up needed consultation protocols that might lead to the identification and evaluation of TCPs (archaeological sites, TCPs, usual and accustomed resource use areas, etc.).

In consultation with the appropriate tribal representatives, information will be solicited about the presence of any known archaeological sites or TCPs that might be affected by future construction of a preferred alternative. While it is acknowledged that certain information might be culturally sensitive and might not be willingly shared with outsiders, every effort will be made to find culturally sensitive ways of identifying general zones of cultural sensitivity.

The consultation will also attempt to identify any special concerns the Tribes may have about the project—concerns that might extend beyond archaeological sites and TCPs. For example, consultations might identify areas where further in-depth consultation is needed by other project team members (e.g., fisheries, wetlands, etc.).

### **Proposed Coordination with Team, WSDOT, and Sound Transit**

- APE to be defined by the consultant in consultation with the SHPO, and in coordination with Paul Krueger/WSDOT, Steve Kennedy/Sound Transit, and the environmental team (Mark Assam, environmental justice, and Dr. James Bard, cultural resources). The APE, determined in conjunction with the SHPO, will be given an opportunity for review by the affected Tribes (Paul Krueger to coordinate through government-to-government consultations with Tribes) to ensure congruence with tribal needs in identification of TCPs. A timely response by the Tribes is assumed.
- Professional/technical consultation to be coordinated with WSDOT/South Transit, FTA, and FHWA in their formal government-to-government tribal consultations (headed by WSDOT in cooperation with Mr. Jim Leonard/FHWA and Ms. Jennifer Bowman/FTA and with the Suquamish, Duwamish, Muckleshoot, Tulalip, and Snoqualmie Tribes and tribal cultural resources staff).
- Periodic group and/or individual meetings with agency cultural resources staff and/or staff from the co-lead agencies (Steve Kennedy/Sound Transit, WSDOT, Paul Krueger/WSDOT, Jim Leonard/FHWA, and Jennifer Bowman/FTA).

To assess cultural resources impacts, close coordination will be required with the team leads of the following discipline studies:

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- Section 4(f)/ 6(f) Evaluation team – “historic properties” are also considered under Section 4(f).
  - Geology and Soils – cultural resources analysis (archaeological resources) is framed and interpreted within local post-glacial/Holocene geology and soil conditions.
  - Water Resources – cultural resources analysis (archaeological resources) is framed and interpreted with relationship to high probability areas and the relationship of the high probability areas to existing (and former) water bodies.
  - Ecosystems – cultural resources analysis (archaeological and ethnographic resources) are interpreted in relationship to historic plant and animal resources that were key to Native American subsistence and survival, and in relationship to historic/current fisheries resources and former/current “usual and accustomed” fishing spots.
  - Noise and Vibration – cultural resources analysis (historic resources) of impacts on historic buildings and structures must take noise and vibration into consideration as “effects” (or possible “adverse effects”) that could diminish those qualities or characteristics that make historic properties eligible for listing in historic registers or landmark lists.
  - Visual Quality – cultural resources analysis (historic resources) of impacts on historic buildings and structures must take visual intrusions into consideration as “effects” (or possible “adverse effects”) that could diminish those qualities or characteristics that make historic properties eligible for listing in historic registers or landmark lists.

The cultural resources analysts will work with the leaders of these other studies to obtain early reads on anticipated impacts and to secure information needed to complete background elements in the Cultural Resources Discipline Report. The cultural resources impact analysis will incorporate these early impact assessments. Upon completion of these other analyses, the cultural resources impact analysis results will be modified as needed to reflect the final findings of these other analyses.

## Study Area

The cultural resources impacts analysis will focus on the APE defined by WSDOT in consultation with the affected Tribes. It is anticipated that the APE will consist of two footprints: (1) the known or anticipated construction footprint that includes staging and laydown areas, and (2) a buffer area (one property deep or 200 to 300 feet from the construction footprint, as needed) that includes sufficient area to encompass commercial buildings and structures, residences, and public facilities (including parks) that might be directly or indirectly affected by project noise, vibration, or visual quality effects.

## Affected Environment Methodology

Existing conditions will be identified along the APEs that could be changed substantially by one or more of the proposed alternatives. Information will be collected to provide a description of existing baseline conditions for use in the discussion of potential impacts.

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## Archaeological Resources Investigative Strategy

Regulations contained in 36 CFR 800 provide a step-by-step process to satisfy the requirements of Section 106. Generally speaking, there are three steps—identification (inventory) of resources, evaluation of resource significance and identification of project effects, and mitigation of adverse effects on significant historic properties. This investigation is designed to satisfy the first of these steps—identification of archaeological sites and Tribal TCPs. If potentially significant resources are discovered, additional work might be required to evaluate their significance and to determine if mitigation measures would be required.

Although there may be no known/recorded archaeological sites or TCPs located within the SR 520 corridor under consideration, the Trans-Lake Washington Project lies within lands and waters once occupied by several Puget Sound Tribes. The descendants of these Indian peoples are still living in the vicinity and include the Suquamish, Duwamish, Muckleshoot, Snoqualmie, Yakama, and Tulalip Tribes and/or tribal organizations. Prior to Euro-American settlement in the 19th century, the study area was home to these Indian groups. As such, the study area is considered to possess a high level of archaeological sensitivity. This investigation will seek to determine which if any of the alternatives is likely to affect archaeological sites and/or TCPs. At least one highly sensitive area has already been identified—Foster Island—a spot reported by newspapers to be a Native American burial ground.

For archaeological resources and TCPs, the information would be collected, reviewed, and analyzed to determine the existence of known archaeological resources and traditional cultural places and/or the probability for hunter-fisher-gatherer, ethnographic, and historic period archaeological resources in the study area. Information evaluated would include:

- Previous cultural resources studies, including archaeological site records and cultural resources reports.
- Environmental background reports, including environmental histories and geological (geomorphologic or geoarchaeological) analyses.
- Ethnographic and historic background material, including relevant ethnographic reports, local histories, newspaper articles, census data, city directories, historic photographs, and historic maps.
- Various information collected from tribal consultations.

Based on this information, known and predicted sites of high, moderate, and low probability will be identified for hunter-fisher-gatherer, ethnographic, and historic period archaeological resources for the study area. A draft map of the designated probability areas and known archaeological, ethnographic, and historic archaeological resources will be prepared, with information provided for entry into the project GIS system as a CONFIDENTIAL layer, with access provided to the lead agencies, consultant team, SHPO, and Tribes.

Using information gathered about known resources and the patterns of prehistoric use of the area, a field reconnaissance survey strategy will be devised to identify archaeological sites in the APE. Field reconnaissance will include examination of all open and undeveloped areas in the APE. Archaeological sites identified in earlier surveys will be revisited to

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determine if they are still present and retain depositional integrity. The actual survey will be accomplished by pedestrian transects at intervals appropriate for each alternative and level of existing urban development. The survey will consist of surface investigation with limited shovel probing in areas where surface visibility is poor due to dense vegetation. Formal subsurface testing (if warranted) could be conducted at a later date, but it is currently not part of this EIS scope and budget. All archaeological sites that are discovered will be mapped, photographed, and recorded using OAHF site forms. The cultural resources team will determine the eligibility of any discovered sites.

### Historic Resources Investigative Strategy

Because of the inherent differences in character between archaeological and historic resources, there will be some variation in approach and methods. The length of the study area and the distinct character of individual neighborhoods in the study area will necessitate treating segments as separate elements within the overall project. To provide context and guidance for the historical resource survey, an historical overview will be prepared with a summary history of some or all of the following neighborhoods or cities, as needed: Eastlake, Portage Bay, Roanoke, North Capitol Hill, Montlake, University, Laurelhurst, and Madison Park (in Seattle); Medina; Hunts Point; Yarrow Point; Clyde Hill; Lakeview in Kirkland; Northtown, Bridle Trails, and Bel-Red/Northup in Bellevue; and Overlake, Grass Lawn, Downtown Redmond, Northeast Redmond, and Southeast Redmond in Redmond.

The identification and evaluation of historic resources will involve a literature search; the collection of existing data, including archival records, building permits, historic photographs and maps; and an analysis of these data to assess eligibility for NRHP listing or city landmark designation. Both designated historic resources and those that previous surveys have identified as potentially significant will be listed in a table to assist in alternative analysis. The table will include key information such as address, common and historic names, date of construction, significance, and where available, the name of the architect. A draft map of the designated and potential historic resources will be prepared, with information provided for entry into the project GIS system to produce a GIS map of the resources.

Following compilation of existing information, a field survey will be conducted of those sections of the study area that have not previously been adequately surveyed for historic and/or archaeological or cultural resources. Buildings identified in earlier surveys will be reevaluated to confirm that they are still standing and retain architectural integrity. Previously unrecorded resources will be photographed and data entered on field inventory forms. The field survey will be a systematic review of each building (other than those already designated as landmarks) built before 1962 in the target area. A log will be kept noting the address of each building, whether or not it is surveyed, and the reason for rejection (such as major alterations). For each building that meets the criteria per as below, a survey form will be completed with a description of the building's key characteristics, its construction date, and a brief history of uses. Information will be collected from published directories, city directories, city building permit files, and King County Tax Assessor property record cards. Current and historic photographs (where available) of each building will be included.

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OAHF Historic Property Inventory Forms will be prepared for resources that meet the criteria of age, integrity, and significance. Inventory forms will not be prepared for resources that do not meet these criteria. If properties are encountered that are marginal or questionable, consultation with the OAHF architectural historian will determine whether further investigation is necessary. Determinations of NRHP eligibility will be made by the SHPO and city landmark eligibility will be assessed by the applicable city historic preservation officer.

The surveyed buildings will then be evaluated in accordance with NRHP evaluation criteria and the City of Seattle's landmark designation process (or similar process identified for any of the other communities).

The technical report will document these findings.

## Environmental Consequences Analysis Methodology

The analysis of the environmental consequences will follow the standard approach for analysis of impacts (effects) on historic properties, archaeological sites, and cultural resources. The ACHP's regulations implementing Section 106 of the NHPA create a process by which federally assisted undertakings are reviewed for their effect on properties listed in or eligible for listing in the NRHP. After identifying the resource, the next step is applying the Criteria of Effect and Adverse Effect to determine whether the proposed alternatives could affect the property and whether that effect should be considered adverse.

The criteria of effect and adverse effect are used to determine whether the undertaking could change the characteristics that qualify the property for inclusion in the NRHP. If the characteristics are changed, for better or worse, it is considered to have an effect. If the undertaking could diminish the integrity of such characteristics, it is considered to have an adverse effect. Examples of adverse effects are listed in 36 CFR 800.5(a)(2) as follows:

- Physical destruction of or damage to all or part of the property.
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR Part 68) and applicable guidelines.
- Removal of the property from its historic location.
- Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance.
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features.
- Neglect of a property that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian Tribe or Native Hawaiian organization.



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- Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

Once the significant historic resources are identified and the proposed alternatives are sufficiently refined, the resources that are potentially affected by the project will be identified for each alternative. This will be accomplished by reviewing drawings and plans of the proposed alternatives along with maps of the significant historic resources. Two categories of resources will be identified: those that may be affected by demolition and those that may be affected by disruption during construction, or noise, visual, or traffic impacts after construction.

### **Direct Impacts**

Direct impacts might include actions that require demolition or removal/transfer of historic buildings and structures, excavation/removal of archaeological sites, or direct physical interference with a TCP.

Direct impacts may also be irreversible. Irreversible impacts are those that would completely destroy significant (e.g., NRHP-eligible historic properties) cultural resources if the destruction cannot be otherwise mitigated through measures commonly used to reduce project impacts on significant cultural resources to a nonsignificant level. Because many kinds of cultural resources are by their nature nonrenewable resources (archaeological sites, historic building and structures, TCPs), project-induced changes to significant cultural resources that effectively destroy or completely degrade their archaeological, architectural, historical, or cultural values and attributes result in a commitment of nonrenewable resources.

Direct impacts might include actions that produce "proximity effects" on historic buildings and structures (noise, vibration, visual intrusion, etc.). Proximity impacts could also be long-term impacts, which might include introduction of long-lasting or long-term harmful proximity effects (that last long beyond initial project implementation) to historic buildings and structures. or long-lasting or long-term heightened danger to archaeological sites and TCPs.

### **Construction Impacts**

Construction impacts are those direct impacts caused by construction of project facilities and are short-term in nature. Short-term impacts might be reasonably expected to cease once initial project elements have been implemented. Short-term impacts would include temporary proximity effects on historic buildings and structures and temporary conditions of heightened danger to archaeological sites and TCPs.

The magnitude of a specific project impact on a cultural resource may vary depending on the significance of the cultural resource. Semantically, the term "significant" when applied to a cultural resource means that the resource is important enough to be listed in, or is eligible for listing in, a national, state, or local historical resource register or landmark inventory.

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## Mitigation Measure Methodology

When an undertaking is found to have an adverse effect, there is a requirement under the regulations implementing Section 106 to consult with the SHPO and other interested parties to reach consensus on appropriate mitigation measures. Some typical mitigation measures include limiting the magnitude of the undertaking; modifying the undertaking through redesign, reorientation, or other similar changes; relocation of historic properties; documentation of buildings or structures that must be destroyed or substantially altered; and salvage of archaeological or architectural information and materials. Depending on the results of the impacts analysis, appropriate mitigation measures will be discussed with the SHPO during the consultation process.

When there is a finding of adverse effect, the product of consultation is a Memorandum of Agreement (MOA) that contains stipulations specifying how the undertaking will be carried out to avoid or mitigate adverse effects or to accept such effects.

Mitigation measures that might be recommended for impacts on archaeological resources and TCPs include:

- Avoid impacts on potentially significant archaeological resources and traditional use areas, if feasible.
- Prepare an archaeological resources treatment plan prior to the start of construction activities.
- Prepare an archaeological construction monitoring plan prior to construction.
- Develop a MOA among FHWA, WSDOT, Sound Transit, FTA, affected Tribes, and the SHPO during project planning.
- Monitor construction excavation activities by a professional archaeologist.

Mitigation measures that might be recommended to reduce direct impacts on historic resources include:

- Alter the location of the structure itself or of specific elements such as structural supports.
- Construct noise walls or similar measures to reduce vibration and noise impacts on nearby buildings.
- Reduce the construction period or change the staging of construction to reduce construction impacts.
- Document affected historic properties using Historic American Building Survey or Historic American Engineering Record procedures.

Mitigation development would be closely coordinated with the affected city or community historic preservation programs (e.g., Seattle's Historic Preservation Program) and the OAHF to produce a Section 4(f) Programmatic Agreement (if needed).

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## Section 106 Documentation

In addition to the cultural resources section in the EIS, the following documentation will be provided for analysis, which will fulfill SHPO reporting standards applicable to cultural resources studies conducted in Washington.

- An archaeological and TCP overview technical report. This report would include maps and text summarizing the probability for hunter-fisher-gatherer and historic period archaeological resources for the proposed alternatives within the study area, based on archival research and field survey. The report would include background descriptions of environmental data, ethnography, history, and implications for hunter-fisher-gatherer and historic period archaeological resources.
- A historic resources overview technical report. This report would include a table of significant historic resources with information such as address, common and historic names, date of construction and significance; a draft map of the designated and potentially significant historic resources; historic survey/inventory forms and photographs of potentially significant buildings; Determination of Eligibility forms; and Section 106 and Section 4(f) documentation as needed.

The technical reports will be merged into a single technical report. The report(s) will be prepared following the format for the EIS and will include more detailed information. Copies of the archaeological site record and/or historic property inventory forms will be included in an appendix to the report. Geographic locations of archaeological sites will be excluded in most copies of the technical report, and will be available only on a must-see basis.

Because portions of the study area are heavily developed and surface examination for evidence of archaeological remains will be difficult, areas where research evidence suggests a high likelihood for the presence of archaeological resources will be identified. These areas will be subject to further investigations as part of the EIS process. The recommendations section will also include likely mitigation options, if archaeological or TCP resources are discovered.

Potential Section 4(f) properties will also be identified. A Section 4(f) use would be the taking of an archaeological site listed in the NRHP (or determined eligible for listing) that is important for **in-place** preservation. If the site is listed in the NRHP (or is determined eligible for listing) and is important only for **data recovery**, there would not be a Section 4(f) use. A Section 4(f) use would result if the project takes a TCP listed, or is determined eligible for listing, in the NRHP. Altering the setting or other significant characteristic of a TCP may be considered a constructive use under Section 4(f).

The Draft Outline for the Historic, Archaeological and TCP Resources Technical Report is as follows:

### INTRODUCTION

- Laws and Regulations
- Investigative Goals

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## METHODOLOGY

- Archaeological Resources
  - Agency Coordination
  - Tribal Consultation
  - Literature and Records Search
  - Field Methods

- Historic Resources
  - Agency coordination
  - Literature and Records Search
  - Field Survey

## AFFECTED ENVIRONMENT

- Natural Setting

- Cultural Setting
  - Prehistoric Culture Sequence
  - Ethnohistory
  - Previous Archaeological Investigations
  - Tribal Consultations (*status of known TCPs*)
  - Field Reconnaissance Survey

- Historical Setting
  - Context Statement (*by discrete segment/neighborhood*)
  - Resources

## ENVIRONMENTAL CONSEQUENCES

- Archaeological Resources
  - Preliminary Evaluation of Significance of Discovered Sites
  - Definition of Archaeological High Probability Areas
  - Potentially Sensitive Cultural Areas (TCPs)
  - Potential Project Impacts

- Historic Resources
  - Criteria of Effect and Adverse Effect
  - Adverse Effects (*by individual property or district*)

## MITIGATION MEASURES

- Archaeological Resources
- Historic Resources

## RECOMMENDATIONS

- Data Gaps
- Additional Investigations/Consultations

## REFERENCES CITED

## APPENDICES

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